

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re: § Chapter 11
§ Case No. 24-42473-659
MIDWEST CHRISTIAN VILLAGES, §
INC. et al,1 § (Jointly Administered)
§ Hearing Date: July 25, 2024
Debtors. § Hearing Time: 2:00 pm (CT)
§ Hearing Location: Courtroom 7 North
§

NOTICE OF HEARING

PLEASE TAKE NOTICE THAT that a hearing on the below listed motions (the
“Motions”) is scheduled for July 25, 2024 at 2:00 p.m. (Central Time) in Courtroom 7 North,
of the Thomas F. Eagleton United States Courthouse, 111 South Tenth Street, St. Louis, Missouri:

- 1. Debtors’ Motion for Entry of: (A) an Order: (1) Approving Auction Sale Format and Bidding Procedures; (2) Approving Process for Discretionary Selection of Stalking Horse Bidder and Bid Protections; (3) Approving Form of Notice to be Provided to Interested Parties; (4) Scheduling a Court Hearing to Consider Approval of the Sale to the Highest and Best Bidder; and (5) Approving Procedures Related to the Assumption of Certain Executory Contract and Unexpired Leases; and (B) an Order Authorizing the Sale of Property Free and Clear of All Claims, Liens and Encumbrances, ECF No. 13 (the “Sale Motion”); and

1 The address of the Debtors headquarters is 2 Cityplace Dr, Suite 200, Saint Louis, MO 63141-7390. The last four digits of the Debtors’ federal tax identification numbers are: (i) Midwest Christian Villages, Inc. [5009], (ii) Hickory Point Christian Village, Inc. [7659], (iii) Lewis Memorial Christian Village [3104], (iv) Senior Care Pharmacy Services, LLC [1176], (v) New Horizons PACE MO, LLC [4745], (vi) Risen Son Christian Village [9738], (vii) Spring River Christian Village, Inc. [1462], (viii) Christian Homes, Inc. [1562], (ix) Crown Point Christian Village, Inc. [4614], (x) Hoosier Christian Village, Inc. [3749], (xi) Johnson Christian Village Care Center, LLC [8262], (xii) River Birch Christian Village, LLC [7232], (xiii) Washington Village Estates, LLC [9088], (xiv) Christian Horizons Living, LLC [4871], (xv) Wabash Christian Therapy and Medical Clinic, LLC [2894], (xvi) Wabash Christian Village Apartments, LLC [8352],(xvii) Wabash Estates, LLC [8743], (xviii) Safe Haven Hospice, LLC [6886], (xix) Heartland Christian Village, LLC [0196], (xx) Midwest Senior Ministries, Inc. [3401] and (xxi) Shawnee Christian Nursing Center, LLC [0068].



2. *Debtor's Motion for Entry of an Order, Pursuant to Section 333(A) of the Bankruptcy Code and Bankruptcy Rule 2007.2, (I) Waiving the Appointment of a Patient Care Ombudsman and (II) Allowing the Debtors to Self-Report*, ECF No. 8.

At the hearing, the Debtors will be requesting that the Court (a) approve the requested bid procedures for the sale of all or substantially all of the assets of the Debtors<sup>2</sup> and (b) waive the appointment of a patient care ombudsman.

Creditors and parties-in-interest who wish to participate at the hearing and appear by Webex should contact the Courtroom Deputy, John Howley, at 314-244-4808 or by email at John\_Howley@moeb.uscourts.gov. Those interested parties who wish to listen telephonically, but not participate at the hearing, may request dial-in information from the Courtroom Deputy, John Howley at (314) 244-4808 or review the Court's website for dial-in instructions.

**ANY OBJECTIONS OR EXCEPTIONS TO ENTRY OF ANY ORDERS MUST BE FILED ON OR BEFORE 5 PM (PREVAILING CENTRAL TIME) ON JULY 23, 2024 AND MUST BE SERVED UPON THE UNDERSIGNED AS WELL AS JOSEPH R. SCHLOTZHAUER, OFFICE OF THE UNITED STATES TRUSTEE, 111 SOUTH 10<sup>TH</sup> STREET SUITE 6.353 ST. LOUIS, MO 63102 AND COUNSEL FOR UMB BANK, N.A., MINTZ, LEVIN, COHN, FERRIS, GLOVSKY AND POPEO, P.C. ONE FINANCIAL CENTER, BOSTON, MA 02111, AND FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT, THOMAS F. EAGLETON COURTHOUSE, 111 SOUTH TENTH STREET, 4TH FLOOR, ST. LOUIS, MISSOURI 63102 AS PER THE ELECTRONIC CASE FILING REQUIREMENTS OF THE COURT.**

**PLEASE TAKE FURTHER NOTICE** that, a copy of the Motions may be obtained: (i) by accessing the Court's website at <https://ecf.moeb.uscourts.gov> through an account obtained

---

<sup>2</sup> The other relief requested in the Sale Motion (ECF No. 13) will be heard at a later date.

from the Pacer Service Center at 1-800-676-6856 or [www.pacer.gov](http://www.pacer.gov), or <http://www.veritaglobal.net/mcv>.

**PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read the Motions carefully and discuss them with your attorney, if you have one in the chapter 11 cases. (If you do not have an attorney, you may wish to consult one).**

**PLEASE TAKE FURTHER NOTICE** that if you do not want the Court to grant the relief requested in the Motions, or if you want the Court to consider your views on the Motions, then you or your attorney must attend the hearing. If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motions and may enter an order granting the relief requested in the Motions.

Dated: July 19, 2024  
St. Louis, Missouri

Respectfully submitted,

**DENTONS US LLP**  
*/s/ Stephen O'Brien*

Stephen O'Brien #43977MO  
**DENTONS US LLP**  
211 N Broadway Ste 3000  
St. Louis, MO 63102  
Telephone: (314) 241-1800  
stephen.obrien@dentons.com

Robert E. Richards (*pro hac vice* pending)  
Samantha Ruben (*pro hac vice* pending)  
Elysa Chew (*pro hac vice* pending)

**DENTONS US LLP**  
233 S. Wacker Drive, Suite 5900  
Chicago, Illinois 60606-6404  
Telephone: (312) 876-8000  
robert.richards@dentons.com  
samantha.ruben@dentons.com  
elysa.chew@dentons.com

– and –

David A. Sosne #28365MO  
**SUMMERS COMPTON WELLS LLC**  
903 South Lindbergh Blvd., Suite 200  
St. Louis, Missouri 63131  
Telephone: (314) 991-4999  
dsosne@scw.law

*Proposed Co-Counsel to the Debtors  
and Debtors-in-Possession*